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19  
20 **UNITED STATES DISTRICT COURT**  
21  
22 **DISTRICT OF NEVADA**

23 PATTI DONNER RUBIN, a Florida  
24 resident,

25 v.  
26 Plaintiff,

27 THE SCOTTS COMPANY LLC, an Ohio  
28 limited liability company,

Defendant.

Case No. 2:09-cv-02419-GMN-RJJ

**UNOPPOSED MOTION FOR  
ENLARGEMENT OF TIME TO  
DELIVER OBJECTIONS AND  
RESPONSES TO DEFENDANT'S FIRST  
SET OF INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF  
DOCUMENTS AND THINGS TO  
PLAINTIFF PATTI DONNER RUBIN**

29  
30 Plaintiff, Patti Donner Rubin ("Plaintiff") by and through her undersigned trial counsel and  
31 pursuant to Rule 6 of the Federal Rules of Civil Procedure, hereby moves this Court for entry of an  
32 order enlarging to and until January 6, 2011, the time in which Plaintiff may deliver its objections  
33 and responses to The Scotts Company LLC's ("Defendant") "Defendant's First Set of Interrogatories  
34 to Plaintiff Patti Donner Rubin" ("First Set of Interrogatories") and "Defendant's Request for  
35 Production of Documents and Things to Plaintiff Patti Donner Rubin" ("Request for Production of  
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1 Documents and Things") in connection with this District of Nevada federal court civil action, and in  
2 support of its motion, states:

3 1. On November 18, 2010, the Defendant served its First Set of Interrogatories and  
4 Request for Production of Documents and Things on the Plaintiff. Defendant served 104  
5 production requests and 17 interrogatories. Plaintiff's responses and objections are presently due on  
6 December 21, 2010.

7 2. Counsel for the Plaintiff has continued to work diligently to prepare responses to  
8 Defendant's discovery requests, but requires 16 additional days to finalize Plaintiff's response and  
9 serve it upon Defendant.

10 3. On December 21, 2010, counsel for the Plaintiff requested a 16-day extension  
11 enlarging to and until January 6, 2011, the time in which Plaintiff may deliver its objections and  
12 responses to the Defendant's First Set of Interrogatories and Request for Production of Documents  
13 and Things on the Defendant. Defendant has agreed to the extension of time requested by Plaintiff.

14 4. The Plaintiff does not waive any objection to the Defendant's First Set of  
15 Interrogatories and Request for Production of Documents and Things in connection with the  
16 requested extension of time.

17 Accordingly, Plaintiff respectfully moves this Court to grant this motion and enlarge to and  
18 until January 6, 2011, the time in which the Plaintiff may deliver its objections and responses to the  
19 Defendant's First Set of Interrogatories and Requests for Production of Documents and Things.

1 Dated this 21<sup>st</sup> day of December, 2010.

2 Respectfully submitted,

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4 By: /s/ John R. Posthumus  
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19 *Attorneys for Plaintiffs*

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21 IT IS SO ORDERED.

22   
23 Robert J. Johnson  
24 UNITED STATES MAGISTRATE JUDGE  
25 DATE: DEC. 29, 2010

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